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8 *Attorneys for Defendant*

9 *Janus Global Operations, LLC*

10 **UNITED STATES DISTRICT COURT**

11 **DISTRICT OF NEVADA**

12 OGE BROWNE,

13 Plaintiff,

14 vs.

15 JANUS GLOBAL OPERATIONS, L.L.C.,
a Foreign Limited Liability Company,
16 DOES I-X; ROE CORPORATION I-X,

17 Defendant.

Case No.: 2:19-cv-01645-JCM-DJA

**STIPULATION AND ORDER TO EXTEND
DEADLINE FOR DEFENDANT TO FILE
ANSWER OR OTHERWISE RESPOND TO
PLAINTIFF'S COMPLAINT**

(First Request)

18 IT IS HEREBY STIPULATED by and between Plaintiff Oge Browne ("Plaintiff"),
19 through his counsel HKM Employment Attorneys, LLP, and Defendant Janus Global Operations,
20 LLC ("Defendant"), through its counsel Jackson Lewis P.C., that Defendant shall have up to and
21 including Friday, October 28, 2019, in which to answer or otherwise respond to Plaintiff's
22 Complaint. This Stipulation is submitted and based upon the following:

- 23 1. That Defendant's answer or response is currently due on October 11, 2019.
- 24 2. That this is the first request for an extension of time for Defendant to answer or
25 otherwise respond to Plaintiff's Complaint.
- 26 3. That such an extension is necessary because defense counsel requires additional
27 time to investigate facts that will allow for an informed response to the pending Complaint.

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4. That this request is made in good faith and not for the purpose of delay.

5. That nothing in this Stipulation, nor the fact of entering to the same, shall be construed as waiving any claim and/or defense held by any party.

Dated this 9th day of October, 2019.

HKM EMPLOYMENT ATTORNEYS, LLP

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Janus Global Operations, LLC*

ORDER

IT IS SO ORDERED:



Daniel J. Albregts
United States Magistrate Judge

Dated: October 16, 2019

4853-1927-4921, v. 1